

CHAITMAN LLP
465 PARK AVENUE
NEW YORK, NY 10022
(888) 759-1114
TELEPHONE & FAX

HELEN DAVIS CHAITMAN
hchaitman@chaitmanllp.com

January 1, 2016

VIA ECF AND EMAIL

Honorable Stuart M. Bernstein
United States Bankruptcy Court
Southern District of New York
One Bowling Green
New York, NY 10004-1408

Re: *Irving H. Picard, Trustee v. Helen Saren-Lawrence* Adv. Pro. No. 10-04898
(SMB)

Dear Judge Bernstein:

I write in response to Mr. Sheehan's letter dated December 31, 2015, to make one simple point: The defendant is not in a position to confirm the transfers between herself and Madoff for the life of her account because she does not have the records and, clearly, she cannot rely upon Madoff's records. Again, we do not object to the Trustee's subpoena of the bank records. However, the only information on those records to which the Trustee is entitled is the information reflecting transfers to and from Madoff. We are simply asking that everything else be redacted because it is confidential and the Trustee has no right to confidential information.

Yours Respectfully,

/s/ Helen Davis Chaitman

Helen Davis Chaitman, Esq.

HDC:sh

cc: *Via ECF and Email*
Casey E. Holder (cholder@bakerlaw.com)
David J. Sheehan (dsheehan@bakerlaw.com)